

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

March 21, 2012



General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the 2012 Capitol Hill Day and Reception on March 21, 2012

NASA invitees, accompanied by their spouse or a guest, may attend the 2012 Capitol Hill Day and evening reception on March 21, 2012, hosted by the Society of Women Engineers (SWE), a nonprofit organization under 501(c)(3) of the Internal Revenue Code. 29 STEM and diversity organizations are sponsoring the event including, AAUW, ABET, AIMBE, AIChE, ANS, ASABE, ASCE, ASEE, ASHRAE, ASME, Automation Federation, AWIS, IEEE, IIE, ISA, MentorNet, NACME, NAMEPA, National GEM Consortium, NCWIT, NOGLSTP, NSBE, NSPE, The Optical Society, SAE International, Society for Mining, Metallurgy, and Exploration, Society of Manufacturing Engineers, SPIE, and WEPAN. This training will be held in Washington, D.C. at the Hyatt Regency Capitol Hill from 1 p.m. to 4:30 p.m. The reception will be held at the Rayburn House Office Building in Room B-369, from 5:30 p.m. to 7:30 p.m.

The event will feature as guest speaker NASA's Associate Administrator for Diversity and Equal Opportunity Brenda R. Manuel. She will participate in a panel entitled "Perspectives from the Administration and Congress" as part of SWE's 2012 Capitol Hill Day. The reception will provide invited NASA employees with an opportunity to discuss NASA's activities and programs with other individuals in attendance. The training session will be used to discuss how to increase diversity in the STEM workforce.

Approximately 70 people will attend the training session and 120 people are expected to attend the reception. Expected attendees include Members of Congress and congressional staff, as well as the aerospace industry, academia, DoD, NASA personnel and personnel from other Federal agencies. The reception will include refreshments valued at approximately \$75 per person. In addition, the reception is open to the general public. In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event meets the definition of a "widely attended gathering."

I further find that there is an agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations by providing information about current NASA programs and exchanging views with other attendees.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a stylized, flowing script.

Adam F. Greenstone